



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

May 31, 2023

BY ECF

Honorable Paul G. Gardephe
United States District Judge
Southern District of New York
40 Foley Square, Room 2204
New York, New York 10007

Re: *United States v. Shabazz McKune*, 9 Cr. 572 (PGG)

Dear Judge Gardephe:

The Government submits this letter to respectfully request that chronologies maintained by the United States Probation Office ("Probation"), detailing Shabazz McKune's supervision, be unsealed by the Court so that Probation may provide them to the parties ahead of the June 7, 2023 VOSR hearing currently scheduled in the above-captioned case. The pending VOSR matter involves, among other specifications, four specifications arising out of a reported domestic violence incident on April 14, 2023 (Specifications 1 through 4). Given the nature of the specifications, the Government may call a Probation Officer to testify at the hearing currently scheduled for next Wednesday, June 7.

The chronologies maintained by the United States Probation Office contain material relevant to the hearing, and the Government understands that they may be unsealed only upon a Court order. In addition, once in possession of the files, the Government must disclose them to the defendant pursuant to Title 18, United States Code, Section 3500 and/or pursuant to its obligations under *Brady v. Maryland*, 373 U.S. 83 (1963) and *Giglio v. United States*, 405 U.S.

MEMO ENDORSED

The Application is granted.

SO ORDERED:

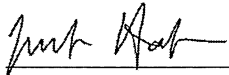

Paul G. Gardephe, U.S.D.J.

Dated: June 1, 2023

150 (1972). Accordingly, the Government respectfully requests that the chronologies be ordered unsealed.

Respectfully submitted,

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United States Attorney

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cc: Counsel of Record (by ECF)